



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Collecting Household, Family Farm and Conditionally Exempt Small Quantity Generator Hazardous Waste

Guidance Document
March, 1998

Division of Environmental Quality
Technical Assistance Program

Question #1:

What is the purpose of this guide?

This guide focuses on Missouri requirements for cities, counties, solid waste management districts or other entities that collect, segregate and store hazardous chemicals produced by households, family farms, and conditionally exempt businesses. This guidance does not apply to commercial hazardous waste facilities that recycle or dispose of these wastes.

Question #2:

What is hazardous waste?

A waste is a solid, gas, or liquid material that is no longer needed and will be discarded. It is hazardous if it has certain properties that could pose dangers to human health or the environment. The Federal Resource Conservation and Recovery Act (RCRA) defines hazardous waste as a type of solid waste which is either listed in the federal or state rules as hazardous or exhibits one or more of the characteristics of hazardous waste: toxicity, corrosivity, reactivity, or ignitability. Hazardous waste is usually tracked "Cradle to Grave". That means when produced in large enough amounts or regulated quantities, federal and state rules require generators of hazardous waste to obtain an EPA identification number; use a manifest to ship wastes with a licensed hazardous waste trans-

porters; submit reports on the generation, transportation and final disposition of waste; and ensure that waste management activities comply with all applicable hazardous waste laws and regulations. Households, family farms, and Conditionally Exempt Small Quantity Generators (CESQG) may produce the same waste chemicals or materials as regulated generators of hazardous waste. However, they are regulated less stringently because of the large number of generators and the relatively small quantities generated by each one.

Question #3:

What is Household Hazardous Waste?

Household hazardous waste (HHW), means any household waste excluded from regulation as hazardous waste but otherwise meets the definition of hazardous waste. They are materials produced in homes that exhibit the characteristics of: toxicity, corrosivity, reactivity, or ignitability.

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- **How is it managed?**

Wastes generated by consumers in their homes are not regulated as hazardous waste, but as a type of solid waste. HHW is exempt from many federal hazardous waste regulations¹ even when HHW is transported, stored or disposed of.

- **How is it collected?**

Collections of household hazardous waste (HHW) can occur at special one-day events or at permanent HHW facilities. Many one day HHW and family farm hazardous waste collections have been held in Missouri. Missouri also has five permanent HHW collection facilities at Kansas City (816) 241-2288, Chillicothe (816) 646-1664, Columbia (573) 874-6280, Springfield (417) 864-1904, and Lee's Summit (816) 251-2116. A plan is being developed with guidelines for design and operation of collection facilities. Permits are not necessary at facilities that collect and store household hazardous waste. It should be noted that, in Missouri, HHW becomes a regulated hazardous waste if it is segregated from the solid waste stream and accepted by a commercial hazardous waste treatment, storage or disposal (TSD) facility. The commercial TSD facility becomes the generator ² of the HHW it accepts.

Question #4:

What is family farm hazardous waste?

Family farm hazardous waste is similar to household hazardous waste except that waste pesticides make up a much larger percentage of the waste. Pesticide use is regulated by the Missouri Department of Agriculture (MDA), but when no longer wanted, a pesticide becomes a waste and is regulated by the Missouri Department of Natural Resources (DNR).

- **How is it managed?**

Missouri law exempts farmers who

generate only small quantities of hazardous waste³. The MDNR does not require tracking the hazardous wastes produced, unless more than 220 pounds of hazardous waste (or 2.2 pounds of acutely hazardous waste such as cyanide) are generated per month or accumulated at any one time. If they generate or accumulate regulated quantities of hazardous waste, they must follow requirements for generators of hazardous waste. A HHW collection program *may not accept regulated quantities of hazardous wastes unless they obtain a hazardous waste treatment, storage or disposal permit*. To avoid the need for obtaining this permit, HHW collection programs should be careful to screen their participants. This can be accomplished by using a pre-registration form that will limit the type and quantity of waste that the facility wishes to accept in their collections. (Also refer to **Question #5.**)

- **How is it collected?**

Collection of family farm hazardous waste can take place at special one day collections or at HHW collection facilities.

Question #5:

What is Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste?

Businesses that produce hazardous waste below regulated quantities, defined as under 220 pounds per month of hazardous waste or 2.2 pounds of acutely hazardous waste per month, or do not accumulate this amount at any one time, are conditionally exempt from most hazardous waste requirements.

- **How is it managed?**

Missouri law prevents this waste from going into sanitary landfills⁴. It must be handled by a commercial hazardous waste facility or taken to a certified resource recovery facility.

Question #6:

What are the similarities in how household, family farm and Conditionally Exempt Small Quantity Generator hazardous waste are managed?

Households, family farmers who have small quantities of hazardous waste and businesses with conditionally exempt small quantities of hazardous waste do not need to obtain an EPA identification number, nor must they meet all the RCRA requirements that apply to regulated hazardous waste generators.

However, when storing or disposing of hazardous waste, they must manage their waste in a manner that does not threaten human health or the environment, or create a public nuisance. It is not proper to dispose of these chemicals in the environment. *They should never be dumped into storm drains, backyards, or septic systems, nor should they be burned.* Some types of hazardous waste may be acceptable for sanitary sewer disposal only with the approval, and under the terms set by the municipal waste water system manager.

While it is legal for householders to put their hazardous waste into the trash, or place it in sanitary landfills, doing so can cause environmental risks for groundwater and surface water contamination, and can endanger sanitary workers collecting trash and covering it at the landfill. Some trash haulers and sanitary landfills choose not to accept HHW.

Used oil from any source is prohibited from disposal in a sanitary landfill. Used oil which is intended to be disposed is regulated as any other hazardous waste. If it is intended for recycling, it is managed as used oil and is not a state hazardous waste⁵.

Question #7:

How are household and family farm collection centers regulated?

Those who want to collect HHW and family farm hazardous waste are asked to notify the Technical Assistance Program (TAP) at 800-361-4827. Please provide TAP the following information:

- Name of collection entity and contact person
- Address of collection location(s)
- Time frame for collection activities
- A description of the proposed activity

The entity collecting the HHW or the HHW contractor becomes the generator, depending on the contractual arrangements made for transportation, recycling, treatment or disposal.

Mobile collection facilities do not need any special permits from MDNR for picking up HHW. When HHW is transported, it needs to comply with all federal Department of Transportation rules for packaging, labeling and shipping of hazardous materials. Vehicles need to be marked and placarded correctly.

Do-It-Yourselfer Used Oil Collection Centers collect used oil only from households and farmers who produce an average of 25 gallons or less of used oil per month. Do It Yourselfer Used Oil Collection Centers are required to notify the department of their used oil activities. *Used oil destined for recycling must be transported off site by a MDNR licensed hauler after it is collected and managed according to the used oil regulations.*

• **Voluntary Reporting**

DNR asks collectors to report to TAP by March 1 for the previous calendar year the type and amount of the following material collected in pounds:

- bulk fuels
- bulk latex paint
- bulk oil based paint
- bulk used oil
- corrosive acids
- corrosive bases
- dioxin
- flammables, pesticides and chlorinated products
- oxidizers
- poisons
- reactive solids
- sorted aerosols
- sorted batteries
- antifreeze
- other

These reports will be used to document to funding agencies and the public the reduction of these materials going into the environment and to inform people of HHW disposal opportunities.

Question #8:

Can Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste be accepted at HHW collection centers?

HHW collection centers can accept Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste, but they will be required to obtain an EPA ID number. These collection centers are *not* required to have a TSD permit from MDNR to accept the CESQG wastes, as long as it is not stored over 90 days. They must comply with requirements for large quantity generators of hazardous waste.

HHW and CESQG wastes *can* be mixed, where appropriate, for shipping purposes,

but the mixture then becomes a hazardous waste. The total amount will be subject to the Missouri Hazardous Waste Tax.

Mobile HHW collectors will need a hazardous waste transporter license once they accumulate 220 pounds (or 2.2 pounds of acutely hazardous waste) or more of CESQG hazardous waste. Regulated quantities cannot be taken to HHW facilities unless they are permitted hazardous waste TSDs.

Question #9:

Why would a CESQG want to use a HHW collection facility?

Since disposal at a solid waste landfill is prohibited, CESQGs must dispose of their hazardous waste at a permitted hazardous waste TSD facility or certified resource recovery facility. This can be expensive, particularly for businesses with very small amounts.

Because CESQGs need an inexpensive and convenient way to manage their hazardous wastes, some jurisdictions are providing collection services at their HHW facilities. CESQ's are billed according to what it costs for the HHW facility to manage their wastes.

Question # 10:

What other permits or codes must be followed in addition to MDNR requirements?

Facilities used to store HHW must comply with all relevant local zoning, fire, electrical, plumbing and building codes. Although HHW is exempt from many federal and state hazardous waste regulations, MDNR still recommends that sponsors of HHW collection programs manage the collected HHW as a hazardous waste. A community which goes to the effort and expense of collecting these materials, presumes that

a greater level of environmental protection should be employed for these wastes. In selecting management options the following hierarchy is recommended:

- Reduce the use of hazardous household products;
- Reuse and recycle as much household hazardous waste as possible;
- Treat HHW in a hazardous waste treatment facility; and
- Dispose of remaining HHW in a permitted hazardous waste landfill.

It is recommended that sponsors use hazardous waste management professionals and licensed hazardous waste transporters who will properly manage the HHW as a hazardous waste for recycling, treatment or disposal.

Question #11:

Where can I find more information?

For more information regarding the requirements for generators, transporters or collection of household hazardous waste, family farm hazardous waste, or Conditionally Exempt Small Quantity Generator hazardous waste, please call the Missouri Department of Natural Resources:

Hazardous Waste Program
(573) 751-3176

Solid Waste Management Program
(573) 751-5401

Technical Assistance Program
1-800-361-4827

WebPage:<http://www.state.mo.us/dnr/deq/homedeq.htm>

¹ See 40 CFR 261.4(b)(1)

² See 10 CSR 25-4.261(2)(A)9.

³ See §260.380.2, RSMo.

⁴ See §260.432.5.2 RSMo

⁵ See 10 CSR 25-11.279.